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BEFORE THE JUL 10 3 13 PM 'S7 POSTAL RATE COMMISSION, L RATE COMMISS OF WASHINGTON, D.C. 20268400010F THE SECRETARY

RATE AND FEE CHANGES, 1997

Docket No. R97-1

DIRECT TESTIMONY OF

R. TIMOTHY MACDONALD

ON BEHALF OF

UNITED STATES POSTAL SERVICE

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DIRECT TESTIMONY OF R. TIMOTHY MACDONALD

AUTOBIOGRAPHICAL SKETCH

2	My name is R. Timothy Macdonald, and I am an accountant in the
3	National Accounting function of the United States Postal Service. I am a
4	Certified Public Accountant in the state of Virginia and have been with the Posta
5	Service for over six years, most recently at Headquarters since May of 1996. M
6	responsibilities at the Postal Service include the preparation of the annual
7	financial statements, the Annual Report and the Comprehensive Statement to
8	Congress. In addition, I perform analysis of accounting issues and policies, and
9	periodically am involved in special projects.
0	Prior to joining the Postal Service, I was employed for 15 years as a
1	systems accountant with the public utility company, Potomac Electric Power
2	Company (PEPCO). My experience at PEPCO consisted of the documentation
3	program design and maintenance of all accounting systems at the federal and
4	state regulated utility. Prior to that, I worked in public accounting with the firms
5	Coopers & Lybrand and Laventhol & Horwath. My public accounting experience
6	consisted of management consulting and auditing of private companies, not-for-
7	profit organizations and government agencies.
8	I hold two degrees from Georgetown University, a Bachelor of Science
9	Degree in International Economics from the School of Foreign Service and a

- 1 Master of Science in Accounting from the Graduate School of Business. I am a
- 2 member of the American Institute of Certified Public Accountants.

PURPOSE AND SCOPE OF TESTIMONY

- 1 The purpose of my testimony is to explain the Postal Service's estimates
- 2 of Workers' Compensation expense in the test year. In the course of the
- 3 discussion, I will explain the components of this expense, the methodology by
- 4 which the estimates are calculated and the justification for the estimated test
- 5 year expense.

WORKERS' COMPENSATION

1	The Postal Service is projecting an expense of \$733.1 million for workers'
2	compensation costs in the FY 1998 test year. Comparable expenses for fiscal
3	years 1994, 1995, 1996 and 1997 are \$326.8 million, \$877.3 million, \$736.5
4	million and \$593.3 million, respectively. These amounts exclude all costs
5	attributable to Post Office Department employees injured prior to the
6	establishment of the Postal Service on July 1, 1971.
7	The Postal Service is subject to the Federal Employees' Compensation
8	Act (FECA). Accordingly, the workers' compensation program for Postal Service
9	claimants is managed by the Office of Workers' Compensation Programs
10	(OWCP) of the Department of Labor (DOL). The Postal Service is billed annually
11	by the OWCP for reimbursement of all payments made to, or on behalf of, Postal
12	Service workers' compensation claimants over the course of the prior OWCP
13	"chargeback year" (July 1 through June 30). With its reimbursement billing, the
14	OWCP also charges the Postal Service a pro-rata share of its estimated
15	administrative costs.
16	The annual Postal Service workers' compensation expense includes [or
17	you can say: "is comprised of"]three components: (1) the net present value of
18	the total estimated long-term liability for those claims which first become active
19	during the current chargeback year, (2) adjustments to the estimate of the
20	existing liability for claims that first became active in prior years, and (3) the pro-
21	rata share of OWCP administrative expenses. Adjustments in the estimated

- 1 liability result from changes in the numbers of active claims, cash outlays per
- 2 claim, and the estimated future durations of claims. Separate liability estimations
- 3 are made for (1) future costs arising from payments to be provided as
- 4 compensation to injured postal claimants and their survivors ("compensation"
- 5 claims) and (2) costs arising from future medical payments on behalf of injured
- 6 postal claimants ("medical" claims).

7 As noted above, Postal Service workers' compensation expense is estimated to be \$733.1 million in the FY 1998 test year. This amount represents a continuation of a trend towards moderation that has been seen from fiscal year 9 1994 forward. This trend towards reductions in, and the leveling off of, this 10 11 volatile expense component reflect the effects of cost reduction efforts 12 undertaken by Postal Service management as a response to the increases in our 13 workers' compensation expense seen in the period of fiscal years 1988 through 1993. This trend also reflects actions undertaken by the DOL's Office of 14 15 Workers' Compensation Programs. Efforts undertaken by the Postal Service include the National Workers' Compensation Task Force, contractor review of in-16 patient hospital expenses, the Limited Duty Task Force, and ongoing Inspection 17 Service efforts to detect fraud and abuse. DOL efforts include their nurse 18 intervention program, Periodic Roll review teams and quality case management 19 initiatives. Taken together, these efforts have arrested the trend towards 20

escalation in postal workers' compensation expense.

21

The Liability Estimation Model

In reporting its financial results, the Postal Service uses the workers'

compensation estimation model to determine the year-end liability. Changes in

that liability relative to the prior fiscal year end represent an expense component.

In its estimations, the model uses payment data provided on tape by the OWCP.

These data are processed at the Minneapolis Accounting Service Center to

prepare summary data by year of injury and severity of injury. These summary

OWCP data, including paid claims, average costs per claim, and a distribution of

claimant age at time of injury, are used as estimation model input.

Since fiscal year 1991, the Postal Service has used the "extended age" estimation model. This model uses actual historic claimant transition ratios, or derivations of the mathematical likelihoods of claims being paid in the next year, to estimate "surviving" claims that will be paid in future years. These transition ratios are used to estimate surviving claims for the first twenty-five payment years. After twenty-five years of payment, claims are deemed to be permanent and the numbers of subsequent surviving claims are estimated using life annuity tables in conjunction with the claimant age at time of injury distribution. Prior to the adoption of the "extended age" model, the Postal Service used a model that assumed all claims became permanent after eight payment years.

The Net Discount Factor

An important component of the workers' compensation liability and expense estimation is the net discount factor used to determine the present

- value of estimated future payments. The Postal Service currently uses net
- 2 discount factors of 0.1 percent for medical claims and 3.0 percent for
- 3 compensation claims. The Postal Service conducts a review of these net
- 4 discount factors on an ongoing basis to validate their appropriateness. A
- 5 summary of all discount rate analyses over the last ten years is included as
- 6 Exhibit USPS-10A. Our most recent prospective and historical discount rate
- 7 analyses for medical and compensation claims are included as Exhibits USPS-
- 8 10B, USPS-10C, USPS-10D, USPS-10E, USPS-10F and USPS-10G. These
- 9 analyses are based on data published in DRI/McGraw-Hill's Review of the U.S.
- 10 Economy, Long-Range Focus. In the opinion of postal management, the
- discount rates currently used for medical and compensation claims represent a
- 12 reasonable difference between medical and societal discount rates and the rates
- of return on government debt instruments of comparable terms to the
- 14 approximate likely lives of medical and compensation claims. It is our opinion
- that the factors currently used reflect the value of the two individual liability
- 16 components and the value of the workers' compensation liability as a whole.

USPS-10A

Workers' Compensation
Discount Rate Analysis
Summary Table of Results of Estimated Discount Rates
Derived from DRI Data
1987 - 1996

Prospective Analyses

	<u>Compen</u>	sation	ļ	<u>Medical</u>
Publication	Trend	Cyclical	Trend	Cyclical
Date	Rate	Rate	Rate	Rate
Summer, 1987	2.92%	3.37%	0.11%	0.57%
Winter, 1987-88	3.14%	3.20%	-0.03%	0.38%
Summer, 1988	2.82%	2.95%	-0.08%	0.01%
Winter, 1988-89	2.97%	3.04%	0.14%	0.00%
Summer, 1989	2.57%	2.87%	-0.26%	0.04%
Winter, 1989-90	2.88%	4.96%	-0.35%	1.86%
Summer, 1990	3.00%	4.50%	0.14%	1.74%
Winter, 1990-91	3.27%	3.22%	0.29%	0.40%
Summer, 1991	3.47%	3.82%	0.22%	0.53%
Winter, 1990-91	3.41%	2.83%	0.07%	-0.44%
Summer, 1992	2.96%	3.04%	-0.65%	-0.90%
Winter, 1991-92	3.42%	3.36%	-0.23%	-0.42%
Summer, 1993	3.23%	3.36%	-0.18%	-0.21%
Winter, 1993-94	3.00%	2.89%	0.01%	-0.26%
Winter, 1994-95	3.30%	3.11%	0.52%	0.25%
Summer, 1995	1.88%	2.02%	0.37%	0.55%
Winter, 1995-96	1.69%	2.13%	0.08%	-0.12%
Summer, 1996	2.78%	3.17%	-0.02%	-0.07%
Winter, 1996-97	2.89%	3.11%	0.06%	-0.02%
Averages	2.93%	3.21%	0.01%	0.20%

Historic Analyses

	<u>Compensation</u>	<u>Medical</u>
1988	2.65%	0.00%
1989	2.77%	0.03%
1990	2.86%	0.14%
1991	2.96%	0.14%
1992	3.02%	0.09%
1993	3.14%	-0.15%
1994	3.53%	-0.13%
1995	3.78%	0.18%
1996	3.87%	0.52%

Workers' Compensation Medical Discount Rate Analysis Trend Projection

Year	Medical Services	3-Month T-Bills	NET
1996 1997 1998 1999 2000 2001	1.90 3.00 4.30 4.70 4.80 4.90	5.14 5.38 5.50 5.34 5.02 4.92 4.89	3.24 2.38 1.20 0.64 0.22 0.02 -0.01
2003 2004 2005 2006 2007 2008 2009 2010 2011	4.90 5.00 5.20 5.30 5.50 5.60 5.60 5.50	4.88 4.90 4.92 4.92 4.92 4.92 4.91 4.91 4.90	-0.02 -0.10 -0.28 -0.38 -0.58 -0.68 -0.69 -0.59
2012 2013 2014 2015 Average	5.50 5.60 5.50 5.60	4.90 4.91 4.91 4.91	-0.60 -0.69 -0.59 -0.69

Source:

DRI Review of the U.S. Economy, Winter 1996-97

Trend Projection

Medical Services Index from Table 15, "Inflation and Productivity" Short-Term Rates for 3-Month Treasury Bills from Table 21, "Interest Rates, Money Flows, and Other Financial Variables"

Year	Medical Services	3-Month T-Bills	NET
1996	1.90	5.14	3.24
1997	3.00	5.38	2.38
1998	4.30	5.50	1.20
1999	4.80	6.07	1.27
2000	6.00	6.61	0.61
2001	7.40	4.68	-2.72
2002	6.50	4.52	-1.98
2003	4.60	4.72	0.12
2004	4.30	5.38	1.08
2005	5.70	6.63	0.93
2006	7.40	6.35	-1.05
2007	8.20	5.23	-2.97
2008	7.00	4.82	-2.18
2009	5.30	4.62	-0.68
2010	4.40	5.43	1.03
2011	5.40	6.64	1.24
2012	7.30	6.94	-0.36
2013	8.10	5.89	-2.21
2014	6.10	5.35	-0.75
2015	4.40	5.72	1.32
Average:			-0.02

Source:

DRI Review of the U.S. Economy, Winter 1996-97

Cycle Projection

Medical Services Index from Table 15, "Inflation and Productivity" Short-Term Rates for 3-Month Treasury Bills from Table 21, "Interest Rates, Money Flows, and Other Financial Variables"

Workers' Compensation Discount Rate Analysis Trend Projection

USPS-10D

	(1) Urban Wage &	(2) 30 Year	(3) NET	(4)	(5)	(6)	(7)
Year	Clerical Workers	U.S. Bonds	2 - 1	10 Year U S. Bonds	NET 4 - 1	5 Year U.S. Bonds	NET 6 - 1
1996	2.90	6.70	3.80	6.44	3.54	6.17	2.27
1997	2.60	6.77	4.17	6.55	3.95	6.31	3.27 3.71
1998	2.60	7.05	4.45	6.85	4.25	6.55	3.71
1999	2.90	6.95	4.05	6.74	3.84	6.43	
2000	3.20	6.72	3.52	6.48	3.28	6.15	3.53 2.95
2001	3.30	6.67	3.37	6.43	3.13	6.08	2.78
2002	3.40	6.67	3.27	6.40	3.00	6.06	2.76
2003	3.50	6.67	3.17	6.40	2.90	6.06	2.56
2004	3.70	6.62	2.92	6.36	2.66	6.03	2.33
2005	3.80	6.56	2.76	6.32	2.52	6.00	2.33
2006	3.90	6.54	2.64	6.31	2.41	5.99	2.20
2007	3.90	6.57	2.67	6.34	2.44	6.01	2.11
2008	3.90	6.59	2.69	6.35	2.45	6.02	2.12
2009	3.90	6.62	2.72	6.37	2.47	6.04	2.14
2010	3.90	6.67	2.77	6.41	2.51	6.07	2.17
2011	4.00	6.73	2.73	6.45	2.45	6.10	2.10
2012	3.90	6.75	2.85	6.47	2.57	6.12	2.22
2013	3.80	6.72	2.92	6.44	2.64	6.10	2.30
2014	3.80	6.73	2.93	6.45	2.65	6.11	2.31
2015	3.90	6.78	2.88	6.49	2.59	6.14	2.24
Averages:			3.16		2.91		2.59

Average All:

2.89

Source:

DRI Review of the U.S. Economy, Winter 1996-97

Trend Projection

Urban Wage & Clerical Workers Index from Table 15, "Inflation and Productivity"

Interest Rates from Table 21, "Interest Rates, Money Flows, and Other Financial Variables"

Workers' Compensation
Discount Rate Analysis
Cycle Projection

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	(1) Urban Wage &	(2) 30 Yr.	(3) NET	(4) 10 Yr.	(5) NET	(6) 5 Yr.	(7) NET
Year	Clerical Workers	U.S. Bonds	2 - 1	U.S. Bonds	4 - 1	U.S. Bonds	6 - 1
1996	2.90	6.70	3.80	6.44	3.54	6.17	3.27
1997	2.60	6.77	4.17	6.55	3.95	6.31	3.71
1998	2.60	7.05	4.45	6.85	4.25	6.55	3.95
1999	3.30	7.29	3.99	7.15	3.85	6.91	3.61
2000	5.30	8.11	2.81	7.95	2.65	7,66	2.36
2001	4.40	7.85	3.45	7.43	3.03	6.85	2.45
2002	4.40	7.48	3.08	7.06	2.66	6.53	2.13
2003	3.70	7.14	3.44	6.79	3.09	6.34	2.64
2004	3.30	7.02	3.72	6.79	3.49	6.48	3.18
2005	5.30	7.72	2.42	7.61	2.31	7.38	2.08
2006	6.10	8.41	2.31	8.17	2.07	7.78	1.68
2007	5.20	8.21	3.01	7.83	2.63	7.28	2.08
2008	5.00	7.72	2.72	7.33	2.33	6.80	1.80
2009	4.00	7.19	3.19	6.83	2.83	6.35	2.35
2010	3.20	7.09	3.89	6.85	3.65	6.54	3.34
2011	4.30	7.66	3.36	7.55	3.25	7.35	3.05
2012	6.30	8.53	2.23	8.36	2.06	8.06	1.76
2013	4.70	8.55	3.85	8.21	3.51	7.73	3.03
2014	3.90	7.84	3.94	7.48	3.58	7.04	3.14
2015	3.10	7.60	4,50	7.31	4.21	6.98	3.88
Averages:			3.42		3.15		2.77

Average All:

3.11

Source:

DRI Review of the U.S. Economy, Winter 1996-97

Cycle Projection

Urban Wage & Clerical Workers Index from Table 15, "Inflation and Productivity"

Interest Rates from Table 21, "Interest Rates, Money Flows, and Other Financial Variables"

Workers' Compensation Medical Discount Rate Analysis Historical Trends: 1977-1996

Fiscal Year	Medical Inflation	3-Month T-Bills	NET
	matter	. 23	
1977	9.70	5.27	-4.43
1978	7.90	7.19	-0.71
1979	8.60	10.07	1.47
1980	11.30	11.43	0.13
1981	11.60	14.03	2.43
1982	9.60	10.61	1.01
1983	7.20	8.61	1.41
1984	6.70	9.52	2.82
1985	5.80	7.48	1.68
1986	4.60	5.98	1.38
1987	5.80	5.77	-0.03
1988	6.80	6.67	-0.13
1989	6.80	8.11	1.31
1990	5. 5 0	7.49	1.99
1991	6.50	5.38	-1.12
1992	5.50	3.43	-2.07
1993	5.10	3.00	-2.10
1994	4.00	4.35	0.35
1995	3.80	5.65	1.85
1996	1.90	5.14	3.24
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Averages:

Sources: 1975 - 1988 from DRI U.S. Long-Term Review, Fall, 1986

1989 from DRI Review of the U.S. Economy, Winter, 1989-90 1990 from DRI Review of the U.S. Economy, Winter, 1990-91 1991 from DRI Review of the U.S. Economy, Winter, 1991-92 1992 from DRI Review of the U.S. Economy, Winter, 1992-93 1993 from DRI Review of the U.S. Economy, Winter, 1993-94 1994 from DRI Review of the U.S. Economy, Winter, 1994-95 1995 from DRI Review of the U.S. Economy, Winter, 1995-96 1996 from DRI Review of the U.S. Economy, Winter, 1996-97

0.52

	(1) Urban Wage &	(2) 20 Years		(3) NET	(4) 10 Yr.	(5) NET	(6)		(7)
Year	Clerical Workers	U.S. Bonds		2 - 1	U.S. Bonds	4 - 1	3-5 Yr. U.S Bonds		NET 6 - 1
1977	6.50	7.70		1.20	7.40	0.90	6.80		0.30
1978	7.60	8.50		0.90	8.40	0.80	8.30		0.70
1979	11.40	9.30		(2.10)	9.40	(2.00)	9.60		(1.80)
1980	13.50	11.40		(2.10)	11.50	(2.00)	11.50		(2.00)
1981	10.30	13.70		3.40	13.90	3.60	14.30		4.00
1982	6.00	12.90		6.90	13.00	7.00	13.00		7.00
1983	3.00	11.30		8.30	11.10	8.10	10.60		7.60
1984	3.40	12.50		9.10	12.40	9.00	12.10		8.70
1985	3.50	11.00		7.50	10.70	7.20	9.90		6.40
1986	1.50	7.90		6.40	7.70	6.20	7.20		5.70
1987	3.60	8.70		5.10	8.40	4.80	7.80		4.20
1988	4.00	9.10		5.10	8.90	4.90	8.40		4.40
1989	4.80	8.44	*	3.64	8.50	3.70	8.53	**	3.73
1990	5.30	8.61	*	3.31	8.55	3.25	8.32	**	3.02
1991	4.00	8.14	*	4.14	7.86	3.86	6.96	**	2.96
1992	2.90	7.67	*	4.77	7.01	4.11	6.18	+	3.28
1993	2.80	6.60	*	3.80	5.87	3.07	5.13	+	2.33
1994	2 50	7.37	*	4.87	7.08	4.58	6.68	+	4.18
1995	2.80	6.88	*	4.08	6.58	3.78	6.38	+	3.58
1996	2.90	6.70	*	3.80	6.44	3.54	6.17	+	3.27
AVERAGE				4.11		3.92			3.58
AVERAGE AL	.L			3.87					

NOTES:

^{* = 20} year bond index discontinued; 30 year bond index used instead.

^{** = 3-5} year bond index discontinued; 4 year bond index used instead.

^{+ = 4} year bond index discontinued; 5 year bond index used instead.

SOURCES:

Source 1996 data: DRI/McGraw-Hill Review of the U.S. Economy, Long-Range Focus, Winter 1996-97 Source 1995 data: DRI/McGraw-Hill Review of the U.S. Economy, Long-Range Focus, Winter 1995-96 Source 1994 data: DRI/McGraw-Hill Review of the U.S. Economy, Long-Range Focus, Winter 1994-95 Source 1993 data: DRI/McGraw-Hill Review of the U.S. Economy, Long-Range Focus, Winter 1993-94 Source 1992 data: DRI/McGraw-Hill Review of the U.S. Economy, Long-Range Focus, Winter 1992-93 Source 1991 data: DRI/McGraw-Hill Review of the U.S. Economy, Long-Range Focus, Winter 1991-92 Source 1990 data: DRI/McGraw-Hill Review of the U.S. Economy, Long-Range Focus, Winter 1990-91 Source 1987-88 data: DRI/McGraw-Hill Review of the U.S. Economy, Long-Range Focus, Winter 1989-90 Source 1977-86 data: DRI/McGraw-Hill U.S. Long-Term Review, Spring, 1988 Source 1977-86 data: DRI/McGraw-Hill U.S. Long-Term Review, Fall, 1986